

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

JOSEPHINE JAMES EDWARDS,  
individually and on behalf of all other similarly  
situated,

Plaintiff,

vs.

HEARST COMMUNICATIONS, INC.,

Defendant.

No. 1:15-cv-09279-AT-JLC

**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTIONS**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law and Statement of Undisputed Facts Pursuant to Local Rule 56.1, each dated April 3, 2017, and the Declaration of Kristina E. Findikyan dated January 13, 2017 and attached exhibits, Defendant Hearst Communications, Inc., through its undersigned attorneys, will move this Court, before the Honorable Analisa Torres, United States District Court Judge, Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for an Order, pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(h) and 56, granting its motion to dismiss and/or its motion for summary judgment in the above-captioned action, and for such other and further relief as may be just and proper.

Dated: April 3, 2017

Respectfully submitted,

/s/ Jonathan R. Donnellan

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Kristina E. Findikyan  
Stephen H. Yuhon  
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*Attorneys for Defendant Hearst  
Communications, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 3, 2017, a true and correct copy of the foregoing was filed electronically on the Court's electronic filing system, and notice of this filing will be sent to all registered parties by operation of same.

By: /s/ Jonathan R. Donnellan  
Jonathan R. Donnellan